



# COUNTY OF SAN DIEGO

## AGENDA ITEM

### BOARD OF SUPERVISORS

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First District

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Second District

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Third District

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Fourth District

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Fifth District

**DATE:** January 28, 2026

**12**

**TO:** Board of Supervisors

### SUBJECT

**APPROVAL OF CONFLICT OF INTEREST CODE FOR NORTH COUNTY TRANSIT  
(DISTRICTS: ALL)**

### OVERVIEW

The Board of Supervisors serves as the Code Reviewing Body for any local agency, other than cities, with jurisdiction wholly within the County, pursuant to Government Code Section 82011. The recommended action would approve the proposed amendment to the Conflict of Interest code for North County Transit.

### RECOMMENDATION(S)

#### CHIEF ADMINISTRATIVE OFFICER

Approve the Conflict of Interest code for North County Transit.

### EQUITY IMPACT STATEMENT

County government includes standing and special boards, commissions, committees and task forces formed to advise the Board of Supervisors and County staff on issues and policies and to serve as links to the community. Boards, commissions and committees provide an inter-relationship between the residents and the government of the County and as such must provide transparent, bias-free decision-making. The Board of Supervisors serves as the Code Reviewing Body for any local agency, other than cities, with jurisdiction wholly within the County, pursuant to Government Code Section 82011. Under the California Political Reform Act, a public official has a disqualifying conflict of interest in a governmental decision if it is foreseeable that the decision will have a financial impact on their personal finances or other financial interests. In such cases, there is a risk of biased decision-making that could sacrifice the public's interest in favor of the official's private financial interests. To avoid actual bias or the appearance of possible improprieties, the public official is prohibited from participating in the decision.

The recommended action would approve the amended Conflict of Interest code submitted by North County Transit. The Conflict of Interest code in this Board Letter enables the County of San Diego to provide transparency and accountability to individual residents, ensuring equitable operations of the government that are free from undue influence.

**SUBJECT:** APPROVAL OF CONFLICT OF INTEREST CODE FOR NORTH COUNTY TRANSIT (DISTRICTS: ALL)

### **SUSTAINABILITY IMPACT STATEMENT**

Under the Political Reform Act, all public agencies are required to adopt a Conflict of Interest code that designates positions that are required to file the Statement of Economic Interests (Form 700). Conflict of Interest codes must be maintained as updated and accurate to ensure that necessary public officials report their personal financial interests. These required filings provide public transparency about possible conflicts of interest and to ensure governmental decisions are made in the best interest of the public. This Board Letter supports the County of San Diego's sustainability goal of, "Engaging the community to partner and participate in decisions that impact their lives and communities and transparently share results of outcomes."

### **FISCAL IMPACT**

There is no fiscal impact associated with this recommendation. There will be no change in General Fund cost and no additional staff years.

### **BUSINESS IMPACT STATEMENT**

N/A

### **ADVISORY BOARD STATEMENT**

N/A

### **BACKGROUND**

Under the Political Reform Act, all public agencies are required to adopt a Conflict of Interest Code. The code designates positions required to file Statement of Economic Interests, Form 700s, and assigns disclosure categories specifying the types of interests to be reported. The Form 700 is a public document intended to alert public officials and members of the public to the types of financial interest that may create conflict of interest.

The Board of Supervisors serves as the Code Reviewing Body for any local agency, other than cities, with jurisdiction wholly within the County, pursuant to Government Code Section 82011. The recommended action would approve the Conflict of Interest Code of North County Transit. The aforementioned agency is submitting their Conflict of Interest Code for approval by the San Diego County Board of Supervisors.

The Conflict of Interest code is included as Attachment A. Informational documents reflecting agency approval are included as Attachment B.

### **LINKAGE TO THE COUNTY OF SAN DIEGO STRATEGIC PLAN**

Today's proposed action to approve the Conflict of Interest Code supports the Transparency and Accountability Strategic Initiative in the County of San Diego's 2026-2031 Strategic Plan by promoting a culture of ethical leadership and decision making across the enterprise.

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COUNTY TRANSIT (DISTRICTS: ALL)

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Ebony Shelton', written in a cursive style.

EBONY SHELTON  
Chief Administrative Officer

**ATTACHMENT(S)**

Attachment A: Conflict of Interest Code - Clean

Attachment B: Conflict of Interest Code - Supporting Documents